

LAW OFFICES
GREENBLUM & BERNSTEIN, P.L.C.
PATENT, COPYRIGHT AND TRADEMARK MATTERS
1950 ROLAND CLARKE PLACE
RESTON, VA 20191-1411
TEL: (703) 716-1191
FAX: (703) 716-1180
EMAIL: gpatent@gpatent.com
www.gpatent.com

NEIL F. GREENBLUM
BRUCE H. BERNSTEIN
JAMES L. ROWLAND
ARNOLD TURK △
MICHAEL J. FINE
STEPHEN M. ROYLANCE ◊
ROBERT W. MUELLER
WILLIAM E. LYDDANE
WILLIAM S. BOSHНИК *
PAUL A. BRAIER, Ph.D.
P. BRANKO PEJIC *
DANIEL B. MOON
BRUCE H. STONER, JR. ◊
ENOCH PEAVY
SEAN C. MYERS-PAYNE, Ph.D.
JONATHAN R. MILLER *
STEVEN B. POLLICOFF *
BARRY I. HOLLANDER ◊
GARY V. HARKCOM *◊
JAMES P. BONNAMY
JILL M. BROWNING
WALTER SCHLAPKOHL, Ph.D.
NAOKO OHASHI *

HARRY J. GWINNELL ◊
JEFFREY H. HANDELMAN *
KENNETH H. SALEN ◊
SOK K. HONG ◊
TAI KONDO □
JEFFREY R. BOUSQUET ◊
GARY M. JACOBS ◊
JAMES A. GROMADA
SHAWN A. HAMIDINIA, Ph.D.
ALI M. IMAM *
CHAD E. GORKA
CHUONG T. NGUYEN *
DANIELLE C. PIFFERLING
KATHRYN M. CHESNICK □
SAMUEL EBERT-ZAVOS

December 14, 2021

* ADMITTED TO A BAR
OTHER THAN VA
□ REGISTERED PATENT AGENT
◊ OF COUNSEL
△ SENIOR COUNSEL

VIA ECF

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, New York 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 12/15/21

Re: Re: Spectrum Dynamics Medical Limited v. GE; Case No.: 18-cv-11386 (VSB)

Dear Judge Broderick:

We represent Plaintiff Spectrum Dynamics Medical Limited (“Plaintiff” or “Spectrum”) in the above-referenced action. On behalf of Plaintiff, we write pursuant to Rule 5.B. of your Honor’s Individual Practices in Civil Cases to respectfully request permission to file under seal Plaintiff’s Reply in Support of Plaintiff’s Motion for Preliminary Injunction, Declaration of P. Branko Pejic dated December 7, 2021, and accompanying Exhibits 224, 396, 402, 418-430, 432-435, and 440-441, filed today, December 14, 2021, that contain Highly Confidential and Confidential information of the respective parties that is subject to the Stipulated Confidentiality and Protective Order [D.I. 165] (“Protective Order”).

Defendants have proposed redactions of their Highly Confidential and Confidential Information, and Plaintiff has, likewise, done so. Thereafter, the parties conferred via email regarding the respective proposed redactions, and there are no unresolved objections. Accordingly, Plaintiff hereby requests leave to file Plaintiff’s Reply in Support of Plaintiff’s Motion for Preliminary Injunction, Declaration of P. Branko Pejic dated December 7, 2021, and Exhibits 224, 396, 402, 418-430, 432-435, and 440-441 under seal.

The parties’ proposed redactions are highlighted in yellow in the enclosed copy of Plaintiff’s Reply in Support of Plaintiff’s Motion for Preliminary Injunction, and Declaration of P. Branko Pejic dated December 7, 2021.

Hon. Vernon S. Broderick

December 14, 2021

Page -2-

For the aforementioned reasons, Plaintiff respectfully requests permission from this Court to file Plaintiff's Reply in Support of Plaintiff's Motion for Preliminary Injunction, Declaration of P. Branko Pejic dated December 7, 2021 and accompanying Exhibits 224, 396, 402, 418-430, 432-435, and 440-441 under seal.

Respectfully submitted,

/Neil F. Greenblum/

Neil F. Greenblum

cc: All counsel of record (via ECF)

{J734906 05089838.DOCX}